

1 Thomas D. Neeleman, WSBA #33980  
1904 Wetmore Ave, Suite 200  
2 Everett, WA 98201

The Honorable Thomas Glover  
Chapter 7 Proceeding

3  
4 IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON

5 IN RE:

6 LINDA BODEN,

)  
) Case No. 09-22675  
)

) RESPONSE TO MOTION FOR  
) RELIEF FROM STAY BY  
) JP MORGAN CHASE BANK  
)  
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10 **COMES NOW** the debtor, Linda Boden (hereinafter referred to as "Debtor"), by and  
11 through the law firm of THOMAS D. NEELEMAN, ESQ., L.C., her Attorneys of Record, and  
12 pursuant to all applicable portions of United States Bankruptcy Code (U.S.C. Title 11) hereby  
13 objects to the **MOTION FOR RELIEF FROM THE AUTOMATIC STAY** filed previously  
14 by JP Morgan Chase Bank (hereinafter referred to as "Creditor"). The debtor bases this  
15 objection on the following:

- 16 1. The debtor requires additional time in order to meet with Counsel regarding her  
17 options.  
18 2. The debtor requests the stay remain in effect in order to allow the debtor time to  
19 meet with Counsel.  
20 3. The debtor requests the hearing on this matter be continued to February 10, 2010.

21 WHEREFORE, the debtor requests this court deny the relief from stay.

22 DATED January 21, 2010

23 THOMAS D. NEELEMAN, ESQ., L.C.

24 By: /s/ Thomas D. Neeleman  
25 Thomas D. Neeleman, WSBA, 33980  
Attorneys for Debtor  
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MAILING CERTIFICATE

I hereby certify that on January 20, 2010, a copy of this Response to the Motion for Relief by JP Morgan Chase Bank was sent via ECF to James Miersma

/s/ Emilee Morzelewski